

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

Reform of Generator Interconnection            )  
Procedures and Agreements                    )       Docket No. RM17-8-000

**MOTION OF THE ISO/RTO COUNCIL  
TO EXTEND THE COMMENT PERIOD**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.212 (2016), the ISO/RTO Council (“IRC”)<sup>1</sup> respectfully submits this Motion to extend the period for filing comments in response to the Notice of Proposed Rulemaking (“NOPR”)<sup>2</sup> in the above-captioned proceeding by thirty days, so that comments may be filed on or before April 13, 2017.

**I.       MOTION FOR EXTENSION OF TIME**

In the NOPR, the Commission proposes, and seeks comments on, revisions to the Commission’s regulations, the *pro forma* Large Generator Interconnection Procedures (“LGIP”) and the *pro forma* Large Generator Interconnection Agreement (“LGIA”) to incorporate fourteen proposed reforms designed to improve certainty, promote more informed interconnection, and enhance interconnection processes.<sup>3</sup> The proposed reforms, as

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<sup>1</sup> The IRC is comprised of the Alberta Electric System Operator (“AESO”), the California Independent System Operator Corporation (“CAISO”), the Electric Reliability Council of Texas, Inc. (“ERCOT”), the Independent Electricity System Operator (“IESO”), ISO New England Inc. (“ISO-NE”), the Midcontinent Independent System Operator, Inc. (“MISO”), the New York Independent System Operator, Inc. (“NYISO”), PJM Interconnection, L.L.C. (“PJM”), and the Southwest Power Pool, Inc. (“SPP”). ERCOT, AESO, and IESO are not FERC-jurisdictional and are not joining in this Motion.

<sup>2</sup> Notice of Proposed Rulemaking, *Reform of Interconnection Procedures and Agreements*, 157 FERC ¶ 61,212 (2016), 82 Fed.Reg. 4464. The NOPR was published in the Federal Register on January 13, 2017. Comments are due on March 14, 2017.

<sup>3</sup> NOPR at P 5.

the Commission explains, are in response to concerns expressed about the potential shortcomings in the existing interconnection processes in the Petition for Rulemaking submitted by the American Wind Energy Association (“AWEA Petition”) on June 19, 2015, and the comments submitted in response to the Commission’s Technical Conference held on May 13, 2016, to discuss issues relating to the AWEA Petition and other generator interconnection issues, including interconnection of electric storage resources.<sup>4</sup> The proposed reforms are also driven by “a number of developments that impact generator interconnections, including the changing resource mix, the emergence of new technologies, and state and federal policies that have impacted the resource mix.”<sup>5</sup>

The IRC believes that an extended comment period will enable better, more detailed responses to the Commission’s extensive proposals. Each proposal raises a number of questions to which the IRC’s members would like to respond. In addition, the matters addressed in the NOPR are critical to the future of the energy industry, and therefore warrant thorough consideration by all commenters.

The IRC makes this request to ensure that it, its members, and all commenters have sufficient time to coordinate and prepare reasoned comments to address important issues that will inform the Commission in developing any final rule. The IRC’s request to extend the period in which to file initial comments by thirty days is relatively short and is in no way intended to delay the proposals that are presented in the NOPR, nor will any parties be prejudiced by such an extension of time.

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<sup>4</sup> NOPR at PP 3-4.

<sup>5</sup>*Id.* at P 2.

## II. CONCLUSION

For the foregoing reasons, the IRC respectfully requests that the Commission grant this Motion to extend the period for filing comments on the NOPR to April 13, 2017.

Respectfully submitted,

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